

# KAPLAN HECKER & FINK LLP

350 FIFTH AVENUE | 63<sup>RD</sup> FLOOR  
NEW YORK, NEW YORK 10118

1050 K STREET NW | SUITE 1040  
WASHINGTON, DC 20001

TEL (212) 763-0883 | FAX (212) 564-0883

WWW.KAPLANHECKER.COM

DIRECT DIAL 212.763.0883

DIRECT EMAIL rkapan@kaplanhecker.com

March 15, 2022

## BY ECF

The Honorable Lorna G. Schofield  
United States District Judge, Southern District of New York  
40 Foley Square  
New York, New York 10007

*Re: Catherine McKoy, et al., v. The Trump Corporation, et al., 18-cv-09936 (LGS)*

Dear Judge Schofield:

On behalf of Plaintiffs, we write pursuant to the Court's March 11, 2022 Order (Doc. No. 369) to identify a sampling of ten documents containing redactions that Plaintiffs would like the Court to review.<sup>1</sup> Plaintiffs identify the following documents:

1. AAB00001418
2. AAB00002436
3. AAB00003221
4. AAB00003223 (an attachment to AAB00003221)
5. AAB00003234
6. AAB00003283
7. AAB00003290
8. AAB00003292
9. AAB00003353

---


<sup>1</sup> As outlined in Plaintiffs' March 1, 2022 letter (Doc. No. 364), the Marketing Consultants initially redacted a total of 19 documents, and later withdrew redactions on three of them, leaving 16 documents substantially redacted. There appears to be some overlap between the email threads contained in those 16 remaining documents, and while Plaintiffs do not have access to the unredacted emails, Plaintiffs have endeavored to choose a sampling of ten documents that appear to be representative of the full set of 16.

KAPLAN HECKER & FINK LLP

2

10. AAB00003364

Respectfully submitted,



Roberta A. Kaplan

cc: Counsel of Record (via ECF)  
Counsel for the Marketing Consultants (via certified overnight delivery service and email)  
Counsel for ACN (via ECF and email)